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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	CASE NO. 2:13-cr-00018-JCM-GWF
)	
Plaintiff,)	
)	
v.)	STIPULATION TO CONTINUE SELF-
)	SURRENDER DATE
CHARLES MCCHESENEY,)	(SECOND REQUEST)
)	
Defendant.)	

IT IS HEREBY STIPULATED AND AGREED by and between Charles La Bella and Thomas B.W. Hall, counsel for the United States, and Douglass Mitchell, Esq., counsel for defendant Charles McChesney, that Charles McChesney's self-surrender date be extended from October 30, 2015 to November 30, 2015, a period of thirty-one days.

This Stipulation is entered into for the following reasons:

1. On July 20, 2015, the Court imposed on McChensey a 30-month sentence and permitted him to self-surrender on October 23, 2015 at a facility designated by the Bureau of Prisons.
2. On September 8, 2015, McChesney filed a notice of appeal, intending to raise issues relating to the guideline calculations used to impose his sentence.
3. On October 19, 2015, McChesney filed a motion for release pending appeal pursuant to 18 U.S.C. § 3143(b), contending that if he prevails the reduced

1 sentence will be less than the total amount of time he has already served plus the
2 anticipated duration of the appeal process at the Ninth Circuit Court of Appeals.

3 4. The Government intends to oppose McChesney's motion for release pending
4 appeal.

5 5. The parties agree that McChesney's self-surrender date should be extended thirty-
6 one days to permit the parties sufficient time to brief the issues raised by the
7 pending motion and permit the Court time to consider the papers and rule upon
8 the pending motion.

9 6. The parties agree they will not seek to extend Mr. McChesney's self-surrender
10 date beyond November 30, 2015.

11 DATED this 28th day of October, 2015.


12 Respectfully submitted,

13
14 /s/ Alison Anderson
ALISON ANDERSON
15 Trial Attorney

/s/ Douglass Mitchell
DOUGLASS MITCHELL
Counsel for Defendant Charles McChesney

16
17 DATED this 30th day of October, 2015.

18 IT IS SO ORDERED.

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20 
21 HON. JAMES C. MAHAN
22 UNITED STATES DISTRICT JUDGE
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	
)	CASE NO. 2:13-cr-00018-JCM-GWF
Plaintiff,)	
)	
v.)	CERTIFICATE OF SERVICE
)	
CHARLES MCCHESENEY,)	
)	
Defendant.)	

I, the undersigned, hereby certify that this pleading was filed with the clerk of court via ECF and will be served electronically via ECF on all parties that have entered their appearances in this case.

Dated: October 28, 2015

Respectfully submitted,

/s/ Douglass A. Mitchell
Douglass A. Mitchell
Attorney for Charles McChesney